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John Owen  
Gorge 2<sup>nd</sup> Tunnel Project  
Seattle City Light  
P.O. Box 34023  
Seattle, WA 98124-4023

filed electronically: SCL\_Gorge\_2ndTunnel@seattle.gov

RE: Comments of American Whitewater for Non-Capacity-Related Amendment of License for the Gorge Second Tunnel Project, Skagit River Hydroelectric Project (FERC Project No. 553)

Dear Mr. Owen:

Thank you for meeting myself and other members of the conservation community regarding your plans for the Gorge Second Tunnel Project. We appreciate the comprehensive overview of the project you and your staff provided and the opportunity to provide feedback on this project.

### **Interest of American Whitewater**

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954. We have over 5,000 members and 100 local-based affiliate clubs, representing whitewater paddlers across the nation. American Whitewater's mission is to conserve and restore America's whitewater resources and to enhance opportunities to enjoy them safely. As a conservation-oriented paddling organization, American Whitewater has an interest in the Skagit River. A significant percentage of American Whitewater members reside in Western Washington—a short driving distance from this river for recreation. In addition we have been actively engaged in state and federal efforts to define renewable energy through legislative and administrative processes and view this as an important project demonstrating how existing infrastructure can be more efficiently utilized.

### **Comments of American Whitewater**

#### *Opportunity for Renewable Energy*

American Whitewater recognizes and supports the primary goals of this project to increase plant efficiency and derive additional energy from the same volume of water. In our work through legislative and administrative processes we have consistently advocated for more effective and efficient use of existing infrastructure as the most appropriate means of expanding hydropower capacity. Hydropower has major impacts on our river systems and while some utilities and developers are exploring opportunities for new development that involves damming and diverting existing free-flowing rivers, we are strong advocates for projects such as this one that make the best use of the rivers we have already developed. Environmental benefits of the project

including restoration of the quarry site and incorporation of existing voluntary flow measures are significant and in our view outweigh environmental impacts associated with construction.

In describing the environmental benefits of this project the Draft Application for Non-Capacity-Related Amendment of License states that “the energy captured through this efficiency improvement would translate to a reduction in carbon dioxide of nearly 45,500 metric tons annually.<sup>1</sup> It is not clear from the Draft Application where this reduction would occur. We understand that the majority of Seattle City Light’s power comes from utility-owned hydroelectric facilities with the remainder of demand purchased from outside sources that presumably includes some percentage of fossil fuel derived energy. In developing this resource to expand output at the Gorge Hydroelectric Project we understand from the wording in the Draft Application that this would reduce the need to purchase this outside power derived from fossil fuel sources because it would be replaced by the additional generation produced by the described efficiency improvements. We believe it is necessary to describe the specifics of how carbon dioxide would be reduced, to make it clear that we are not simply increasing total production with no real reduction from other sources.

While this project is characterized as resulting in no operational changes, we will likely have an interest in examining operational changes including potential increased flows in the Skagit River bypassed by the project when the current license expires in 2025. It is our understanding that the proposed amendment and associated construction would not preclude opportunities for this discussion in the context of the next relicensing.

#### *Whitewater Recreation*

The reach of the Skagit River bypassed by the Gorge Hydroelectric Project has attracted the interest of whitewater paddlers. Based on observations during spill events this reach may represent a section of river suitable for a high challenge whitewater opportunity. Short, high-challenge opportunities are available on other hydroelectric projects such as the Milner Mile on the Snake River, a class V bigwater run associated with the Milner Hydroelectric Project.<sup>2</sup>

When flows are returned to the river during the time the Gorge Second Tunnel is connected to the Gorge First Tunnel, potentially in August of 2015, American Whitewater has an interest in further investigating the potential of this reach for whitewater recreation. While the project is not set to be relicensed until April 2025, under the current Integrated Licensing Process a Notice of Intent and Pre-Application Document would be filed in late 2019. In developing the Pre-Application Document pursuant to 18 CFR § 5.6 (d)(3)(viii) licensees are expected to describe recreational opportunities within and adjacent to the project boundary. Information collected during the time flows are in the natural river channel could therefore be useful in future development of the Pre-Application Document required for relicensing.

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<sup>1</sup> At page D-2, Draft Application for Non-Capacity-Related Amendment of License, Skagit River Hydroelectric Project (FERC Project No. 553), August 2010.

<sup>2</sup> See Article 415 for Milner Hydroelectric Project (FERC P-2899) and information on the Idaho Power Corporation website:

<<http://www.idahopower.com/OurEnvironment/Recreation/milnerWhitewater/default.cfm>>.

American Whitewater has previously worked with utilities to use opportunistic flow events associated with maintenance or construction to collect information on whitewater recreation prior to formal studies associated with relicensing. As an example in this region, American Whitewater worked with Snohomish PUD to take advantage of an opportunity that occurred during a planned powerhouse turbine test prior to relicensing of the Henry M. Jackson Hydroelectric Project (FERC P-2157). During this test approximately 650cfs was released into a reach that ordinarily received 20-25cfs year around. While the flow release was not intended specifically to provide flows suitable for a formal controlled flow whitewater boating study, the release resulted in flow levels on the Sultan River that were in fact suitable for whitewater boating. The resulting Informal Single Flow Whitewater Boating Opportunity Survey was developed in partnership between American Whitewater and Snohomish Public Utility District and a report was filed with the Federal Energy Regulatory Commission that served as an important reference point during study plan development following initiation of the Integrated Licensing Process.<sup>3</sup> This approach, described in more detail as a Limited Reconnaissance investigation in the National Park Service Flows and Recreation publication,<sup>4</sup> can save time and resources by determining the need and extent of additional formal studies during relicensing.

## Conclusion

We thank you for the opportunity to comment on this project and appreciate the initiative you have taken to advance a project that meets the primary objectives of our organization in increasing hydropower capacity through more efficient use of existing infrastructure rather than construction of new dams. We look forward to continued dialogue as this project moves forward and working with you in documenting potential opportunities for whitewater recreation on the reach of the Skagit River affected by this project. Please consider us an interested stakeholder and include us on the list for future correspondence and opportunities for site visits associated with this project.

Sincerely,



Thomas O'Keefe, PhD  
Pacific Northwest Stewardship Director

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<sup>3</sup> See Report of PUD # 1 of Snohomish County under P-2157 regarding whitewater boating as a recreation resource on the Sultan River; Accession Number: 20060124-5012; [http://elibrary.ferc.gov/idmws/search/intermediate.asp?link\\_file=yes&doclist=4372701](http://elibrary.ferc.gov/idmws/search/intermediate.asp?link_file=yes&doclist=4372701)

<sup>4</sup> Flows and Recreation: A Guide to Studies for River Professionals, by Doug Whittaker, Bo Shelby, and John Gangemi, for the Hydropower Reform Coalition and National Park Service – Hydropower Recreation Assistance, 2005  
<http://www.nps.gov/nrcr/programs/hydro/flowrec.htm>